REMARKS

Claims 1-33 are now pending in the application. Claims 1, 10, and 25 have been amended. Claim 10 has also been amended to correct an informality. The Examiner is respectfully requested to reconsider and withdraw the rejection in view of the amendments and remarks contained herein.

CLAIM OBJECTIONS

Claims 10-17 stand objected to because of an informality. Accordingly, Claim 10, line 1 has been changed to recite – "to support a first structure." Applicants respectfully request withdrawal of the objection and reconsideration of the claims.

REJECTION UNDER 35 U.S.C. § 103 – SODERBERG

Claims 1-33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Soderberg et al. (U.S. Pat. No. 5,722,646). This rejection is respectfully traversed.

The Examiner's attention is directed to amended independent claims 1, 10, and 25. These claims have been amended to clarify that the stanchions are continuously selectively positionable. In this regard, the present invention is not obvious in view of the Soderberg reference because the reference fails to include all the claim limitations of the present invention, and further, does not provide the skilled artisan with the suggestion or motivation to re-engineer the reference to create the present invention. In particular, the nearly infinite number of adjustable positions of the stanchions in the present invention is one distinguishing feature in comparison to the Soderberg reference. For example, the plurality of modular stanchions can be adhesively secured

to the pallet base and are selectively positionable anywhere along x and y axes relative to the top of the pallet base. An example is illustrated in Figures 2 and 3, showing an embodiment of the present invention with an arrangement of stanchions. The stanchions shown could be adhesively secured anywhere along the top surface (in the x and y axes) of the pallet base. There are no additional constraints regarding the orientation and position of the stanchions relative to the base or each other.

In contradistinction, the tooling apparatus of Soderberg has an actuator mechanism that is received by a (finite) plurality of receiving positions (i.e., apertures) in a support table. That is, the Soderberg disclosure expressly limits the location of an actuator mechanism to the defined aperture in the support table, which is unlike the stanchions of the present invention that can be selectively positioned and adhesively secured anywhere along the x and y axes of the top surface of the pallet. Thus, the Soderberg actuators must be located within an aperture on the support table. In fact the Soderberg apertures contain the pneumatic supply and addressable bus interconnection to control the actuators. Consequently, the actuators in Soderberg are constrained and arranged in a spaced relation as mounted in the apertures in the table portion. See col. 3, lines 17-20; see also Soderberg Figures 1 and 2. And each actuator unit is adapted for insertion and removal only at these individual sites on the table. See col. 8, lines 60-64. Hence the present invention cannot be obvious in view of Soderberg reference due to the absence of adhesively secured stanchions that are selectively positionable along x and y axes relative to the top surface of the pallet base. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991) (The prior art reference must teach or suggest all the claim limitations.).

Furthermore, the Soderberg reference does not suggest nor would it motivate the skilled artisan to make the Soderberg actuators adhesively secured to the table top. The Soderberg actuators are necessarily restricted to the locations of the apertures, for the apertures provide the vacuum and air supply lines as well as a bus or network interface for controlling the actuators. See col. 1, lines 52-55. And each aperture position has a unique address. See col. 1, lines 55-62; and see col. 11, line 16. Thus, the dynamic tooling system of Soderberg would be inoperable if the actuators were made adhesively securable and selectively positionable along x and y axes. The Soderberg actuators must be fitted within an aperture defined on the table surface to interface with actuator control commands. The present invention, therefore, cannot be obvious in view of the reference. *In re Ratti*, 270 F.2d 810, 123 U.S.P.Q. 349 (CCPA 1959) (If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims prima facie obvious.).

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: June 21, 2006

By: _____
Christopher A. Eusebi, 44,672

General Motors Corporation
Legal Staff – Mail Code 482-C23-B21
P.O. Box 300 – 300 Renaissance Center
Detroit, Michigan 48265-3000

WAZ/akb